

With that language from Claim 1 in mind, we invite the Examiner's attention back to Fig. 1 of Albey as shown on page 3 of the Official Action. That Fig. 1 indicates that angle β is the angle entering the guide roll while angle α is the angle coming out of the guide roll. In other words, this shows that the β angle is on the upstream side of the guide roll while the α angle is on the downstream side of the guide roll.

The Applicants respectfully submit that this is an incorrect labeling of Fig. 1 on page 3 relative to the language of Claim 1. Specifically, the Applicants respectfully submit that the angles α and β as shown in Fig. 1 on page 3 of the Official Action should be reversed so that they accurately represent the placement of the angles with respect to Claim 1. In other words, the rejection shows that angle β is on the upstream side of the guide roll. It should be on the downstream side of the guide roll according to Claim 1. Conversely, Fig. 1 in the Official Action shows angle α on the downstream side of the guide roll when it should be on the upstream side of the guide roll. This is confirmed by reference to the arrow in Fig. 1 on page 3 of the Official Action wherein the arrow shows that the elongate material (paper in Albey) moves in a direction from right to left. This means that the right-hand side of Fig. 1 is the upstream side and the left-hand side is the downstream side. The Applicants thus enclose a new Fig. 1 which properly places angle α on the upstream side and angle β on the downstream side.

Referring to the enclosed Fig. 1 and also referring to the comments in the rejection that the α angle is approximately 45° while the β angle is just short of 90° , it can be seen that assuming the characterization of the numerical values of those angles is correct, the approximately 45° angle is now the β angle and the just short of 90° angle is the α angle. The implication of this correct interpretation of Fig. 1 as it is applied to Claim 1 is that α is larger than β which is directly contrary to the requirement in Claim 1 that α is less than β . As a consequence, the Applicants respectfully submit that Albey fails to explicitly or implicitly disclose all of the subject matter of Claims 1 and 2. Withdrawal of the rejection is respectfully requested.

Claims 4-5 and 7-8 stand rejected under 35 USC §103 over the combination of Albey with Nojiri. The Applicants respectfully submit that the combination would lead those skilled in the art away from the Applicants claimed subject matter.

The rejection frankly acknowledges that Nojiri does not disclose the yarn path guide of Claim 1. The Applicants agree. The rejection thus turns to Albey for the teachings of the yarn path guide of Claim 1. The problem is that if one skilled in the art were to import the teachings of Albey

with respect to the yarn path guide into Nojiri, the result would be a device wherein α is larger than β which is directly contrary to the Applicants' claimed angle α being less than the angle β .

In other words, Albey provides teachings that are the opposite of one aspect of the Applicants' Claim 1. It is fundamental in establishing obviousness that teachings that lead in the opposite direction and/or lead those skilled in the art away from the claimed subject matter is compelling evidence of non-obviousness. In this case, Albey leads those skilled in the art in the opposite direction and away from the Applicants' claimed angles and their relative relationship. As a result, the combination is inapplicable to Claims 4-5 and 7-8. Withdrawal of the rejection is respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,



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